

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KELLY USANOVIC, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

EXP REALTY, LLC, a Washington limited
liability company,

Defendant.

NO. 2:23-CV-0687-JCC

**UNOPPOSED MOTION AND
[PROPOSED] ORDER REGARDING
DEADLINE FOR DEFENDANT EXP
REALTY, LLC TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

**NOTE ON MOTION CALENDAR:
June 5, 2023**

I. MOTION

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LCR 7(d)(1), Defendant eXp Realty, LLC ("eXp Realty"), by its counsel, moves this Court for a twenty-eight (28) day extension of time, up to and including July 5, 2023, in which to file an answer or otherwise respond to Plaintiff's Class Action Complaint ("Complaint"). Plaintiff agrees to the requested extension. As grounds therefore, eXp Realty states as follows:

1. Plaintiff filed her Complaint on May 10, 2023. eXp Realty was served with the Complaint on May 17, 2023.

2. eXp Realty's response to the Complaint is currently due to be filed on or before June 7, 2023.

3. Undersigned counsel was recently retained to represent eXp Realty in this matter and therefore requires additional time to review the case materials, conduct its ongoing fact investigation into the allegations in the Complaint, and continue analyzing eXp Realty's defenses to Plaintiff's claims in order to file the appropriate response to Plaintiff's Complaint.

4. Therefore, eXp Realty requests a twenty-eight (28) day extension of time, up to and including July 5, 2023.

5. Plaintiff's counsel has agreed to this extension.

6. This Motion for extension of time is made in good faith and not for purposes of delaying the ultimate resolution of this case.

WHEREFORE, eXp Realty respectfully requests a twenty-eight (28) day extension of time, up to and including July 5, 2023, to file and serve its response to the Complaint, and that the Court provide such other relief as it deems just and proper.

DATED June 5, 2023.

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By: */s/ Duncan E. Manville*

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I certify that this memorandum contains 255 words, in compliance with the Local Civil Rules.

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By: /s/ Amy Starinieri Gilbert

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Attorneys for Defendant

II. ORDER

Defendant eXp Realty, LLC has moved to extend the deadline (currently set for June 7, 2023) to serve its answer or otherwise respond to Plaintiff's Complaint. The Court is advised that Plaintiff's counsel has agreed to this extension. The Court accepts Defendant's unopposed motion.

IT IS HEREBY ORDERED that Defendant eXp Realty, LLC's deadline to serve its answer or otherwise respond to the Complaint is extended by 28 days to July 5, 2023.

DATED this 6th day of June, 2023.

A handwritten signature in black ink, reading "John C. Coughenour", written over a horizontal line.


John C. Coughenour
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby declare under penalty of perjury under the laws of the United States of America that on this date, the foregoing document was filed electronically with the Court and thus served simultaneously upon all counsel of record.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on June 5, 2023.


Eric Yocom